

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS,
DALLAS DIVISION**

MARY KAY INC.,

Plaintiff,

v.

Civil Action No. 3:19-cv-03027-D

KARIN JORDAN AGUDELO, TED
MORENO, MARIA CAMILA
OLIVEROS-JORDAN, ALEJANDRO
OLIVEROS-JORDAN, DAVID
OLIVEROS-JORDAN MILTON
MORENO GARZON, ADOLFO
NARANJO, JUAN GABRIEL NEIRA
JIMENEZ, HILDA MORENO, LAURA
GOMEZ, NOE GOMEZ, JENNIFER
STEPHANIE MARTINEZ FLORES,
ANYELLY MONTOYA, FERNANDO
JAVIER FIGUEROA, YAMIL
FIGUEROA LOBATO, NORMA
BEATRIZ ARATA, MARTIN LOBATO,
and JOHN DOES 1-50, natural persons, and
EASY FAST, INC., CALIFORNIA LA
FASHION, INC., ALL SELLER INC.,
ALLPRODUCTS CORP., SMILE
DISTRIBUTION, INC., SOLODERMA
LLC, OCEAN ONE INVESTMENTS
PRO, LLC, and JOHN DOES 51-100,
business entities,

Defendants.

DEFENDANT'S ORIGINAL ANSWER

Defendant, Fernando Figueroa, files this original answer to plaintiff's, Mary Kay Inc., original complaint.

A. ADMISSIONS & DENIALS

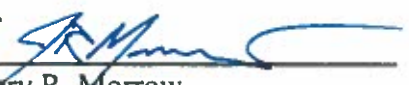
1. Defendant denies the allegations in paragraph 2.
2. Defendant lacks sufficient knowledge or information to form a belief about the truth of paragraphs 3-47.
3. Defendant admits to residing at 9491 Palm Circle South #107, Pembroke Pines, FL 33025. Defendant admits to operating an online storefront on Amazon called “Developer Solutions.” Defendant admits to the Merchant ID. Defendant admits to operation of online store “superdeals99.” Defendant denies the remaining allegations in paragraph 48.
4. Defendant lacks sufficient knowledge or information to form a belief about the truth of paragraphs 49-60.
5. Defendant denies the allegations in paragraph 62.
6. Defendant lacks sufficient knowledge or information to form a belief about the truth of paragraphs 64-201.
7. Defendant denies the allegations in paragraph 202.
8. Defendant denies the allegations in paragraph 206.
9. Defendant denies the allegations in paragraph 208.
10. Defendant lacks sufficient knowledge or information to form a belief about the truth of paragraphs 209- 220.
11. Defendant denies the allegations in paragraph 221.
12. Defendant lacks sufficient knowledge or information to form a belief about the truth of paragraphs 222-223.

13. Defendant lacks sufficient knowledge or information to form a belief about the truth of paragraphs 225 - 227.
14. Defendant lacks sufficient knowledge or information to form a belief about the truth of paragraphs 229 -231.
15. Defendant lacks sufficient knowledge or information to form a belief about the truth of paragraphs 233 - 246.
16. Defendant denies the allegations in paragraph 247.
17. Defendant lacks sufficient knowledge or information to form a belief about the truth of paragraphs 248 - 249.
18. Defendant denies the allegations in paragraph 250.
19. Defendant denies the allegations in paragraphs 251 - 284.
20. Defendant lacks sufficient knowledge or information to form a belief about the truth of paragraphs 285 - 286.
21. Defendant denies the allegations in paragraphs 287 - 297.
22. Defendant denies the allegations in paragraphs 298 - 404.

B. PRAYER

For these reasons, defendant asks the Court to enter judgment that plaintiff take nothing, dismiss plaintiff's suit with prejudice, assess costs against plaintiff, and award defendant all other relief the Court deems appropriate.

Respectfully submitted,

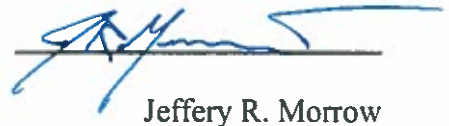
**MANUEL DIAZ LAW FIRM,
P.C.**
By: 
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ATTORNEY IN CHARGE FOR
Defendant Fernando Javier Figueroa

CERTIFICATE OF SERVICE

I certify that on January 27, 2020, a copy of this original answer was served by e-mail to cschwegmann@lynnllp.com at 3:00 a.m./p.m on 1/27/2020, attorney in charge for Plaintiff, Mary Kay Inc.:

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